



ATTACHMENT #28

**TRUCK MANUFACTURER'S ASSOCIATION'S
DOCUMENTATION RE: IMPORTED
MEXICAN VEHICLES**

(8 Pages)

 Attachments can contain viruses that may harm your computer. Attachments may not display correctly.

Van Etten Gary

From: Schaefer, William [wschaefer@truckmfgs.org]
To: Van Etten Gary
Cc:
Subject: TMA letter to FMCSA, NHTSA Re: Mexico truck certifications
Attachments:  TMAFMCSANHTSAMexicotrucks091602.pdf(1MB)

Sent: Thu 2/14/2008 2:08 PM

Hello Gary,

Per our telephone conversation, attached is a copy of the letter we sent to NHTSA and FMCSA Administrators regarding trucks sold in Mexico. It is clear that the information pertains specifically to trucks. I do not have relevant information for motor coaches. Feel free to contact me if you have further questions.

Best Regards,

Will

~~~~~  
 William P. (Will) Schaefer

Manager, Regulatory Affairs

Truck Manufacturers Association

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DOCKETS

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September 16, 2002

FM LSA-01-10846-24

The Honorable Jeffrey W. Runge, M.D.  
Administrator  
National Highway Traffic Safety  
Administration  
400 Seventh Street, SW  
Washington, DC 20590

The Honorable Joseph M. Clapp  
Administrator  
Federal Motor Carrier Safety  
Administration  
400 Seventh Street, SW  
Washington, DC 20590

Dear Administrators:

The members of the Truck Manufacturers Association (TMA) appreciated the opportunity to meet with you and your staff members on August 26<sup>th</sup> to assist the Department in assessing the number of Mexican trucks that have U.S. safety certification labels or could possibly be retroactively certified. We found the meeting to be extremely constructive.

With the exception of Scania, all Mexican medium and heavy-duty trucks are manufactured by American companies either in the U.S. or in Mexico. The focus of our response is on Class-8 tractors as we believe that these will be the vehicles utilized by the Mexican motor carriers seeking U.S. operating authority. Chassis for single-unit trucks are incomplete vehicles. They would have chassis cab labels installed, but the final stage manufacturer would be responsible for affixing the complete-vehicle safety certification label. I have attached examples of International Truck and Engine Corporation's complete vehicle and chassis cab (incomplete vehicle) certification labels for your information. Since Mexico has no requirement for affixing safety certification labels, we would assume that most, if not all, single-unit trucks completed in Mexico would not have complete vehicle U.S. safety certification labels.

The following is a company-by-company analysis of the current situation as we understand it for the eight TMA member companies:

**Ford Motor Company** – Ford manufactures all of its medium-duty trucks in Mexico, but does not sell trucks in Mexico. The Ford medium-duty trucks are exported to the U.S.

**Freightliner LLC** – Mercedes Benz Mexico manufactures Freightliner and Sterling medium and heavy-duty trucks for sale in Mexico at its plant in Santiago Tianguistenco. The following table outlines the Freightliner/Sterling class 8 tractors sold to customers in

Mexico from 1997-2002. Prior to 1997, Freightliner sold a relatively limited number of vehicles to customers in Mexico.

| Model         | Number Sold | Full U.S. Certification | Label* Issues | No ABS |
|---------------|-------------|-------------------------|---------------|--------|
| Century Class | 957         | 100%                    |               |        |
| Columbia      | 1239        | 100%                    |               |        |
| Argosy        | 21          | 100%                    |               |        |
| FLD           | 7678        | 50%                     | 50%           | 20%    |
| Sterling      | 431         | 10%                     | 90%           | 0%     |

\*Label issues include tire labels that do not comply with FMVSS 120, S5.3 and vehicle certification labels that does not comply with §567.4. Both labels are completely in Spanish and the "prayer" is not included on the certification label. In addition, the odometer measures in kilometers yet no "km" identification appears (possible noncompliance with FMVSS 101, S5).

The 30 percent of the FLD vehicles (with ABS) and 90 percent of the Sterling vehicles with label issues would be possible candidates for retroactive certification dependant upon NHTSA's determination with regard to the labeling issues identified above.

**General Motors Corporation** – GM does not manufacture medium-duty trucks in Mexico and sells only incomplete vehicles in the Mexican market.

**International Truck and Engine Corporation** - International Truck and Engine Corporation Mexico both manufactures and sells medium and heavy-duty trucks in Mexico. All International 9000 Series Line Haul Tractors (9200, 9400) sold in Mexico comply with U.S. safety regulations with the exception that ABS could have been deleted from March 1997 to September 2001. From November 1996 until November 1999, 1966 Model 9000 tractors were manufactured at a temporary manufacturing facility in Mexico. No U.S. certification labels were installed on these vehicles. These vehicles, if equipped with ABS, would be candidates for possible retroactive certification. The International Escobedo plant began producing vehicles in July 1999. Since startup, 3357 Model 9000 tractors have been built and sold in Mexico. From July 1999 – September 2001, ABS was a delete option and only those vehicles equipped with ABS would have a U.S. safety certification label. Since September 2001, ABS is no longer a delete option and all 9000 Series tractors have U.S. certification labels. Customer demand for ABS was a major factor in International's decision to discontinue the delete ABS option, therefore, the

assumption is that the majority of tractors built and sold in Mexico from July 1999 until September 2001 had ABS.

International also manufactures 4000 Series medium-duty trucks and 7000 Series severe service trucks. The vast majority of these vehicles are sold as incomplete vehicles. They would have a chassis cab label, but not a complete vehicle U.S. safety certification label. It is possible, however, to purchase these vehicles as tractors. In the case of tractors, if ABS was installed, the vehicle would have a U.S. certification label.

**Isuzu Motors America, Inc.** – Isuzu neither manufactures nor sells medium-duty vehicles in Mexico.

**Mack Trucks, Inc.** – Mack does not manufacture medium and heavy-duty trucks in Mexico. Trucks for the Mexican market were manufactured in the U.S. Mack was in the Mexican market for approximately one year. Mack sold 25 vehicles – 13 tractors and 12 truck chassis. Of the 13 tractors, 2 have U.S. certification labels and 6 additional (because they were equipped with ABS) would be possible candidates for retroactive certification. The attached table summarizes the particulars regarding the Mack vehicles.

**PACCAR Inc** – In North America, PACCAR Inc manufactures Kenworth and Peterbilt trucks. In Mexico, KenMex manufactures Kenworth trucks for sale in Mexico at its plant in Mexicali. It has been the policy of KenMex since 1993 to affix U.S. safety certification labels to any vehicle compliant with the U.S. Federal Motor Vehicle Safety Standards. Kenworth vehicles sold in Mexico include the T600, T800, T2000 and W900 models. Since 1973, it is estimated that approximately 13,000 model T600, 14,000 model T800 and 13,000 model T2000 and W900 vehicles have been sold in Mexico. KenMex estimates that at least 95% of these vehicles were equipped with ABS and could be used in cross border operations.

**Volvo Trucks North America** – Volvo does not manufacture in Mexico. Trucks for the Mexican market are manufactured in the U.S. Since 1998, when Volvo began selling U.S.-built trucks in Mexico, they have sold 3821 VN model truck tractors and 2 VHD model truck tractors. All but 45 of the VN model tractors, which did not have ABS, and the 2 VHD model tractors have U.S. certification labels installed. They have also sold 479 (VHD, Autocar ACL, WAH, WG AND WX truck chassis) incomplete vehicles which had chassis cab labels affixed.

I trust that the Department will find this information to be responsive to its needs. The data contained herein documents and supplements what was discussed at the meeting.

Should you have any questions or need additional information, do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, reading "William A. Leasure, Jr.", written in dark ink.

William A. Leasure, Jr.  
President

cc: Annette Sandberg  
L. Robert Shelton  
Jackie Glassman  
William H. Walsh  
Larry Minor

## Complete Vehicle Certification Label

|                                                                                                                                                   |                       |               |                     |
|---------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|---------------|---------------------|
| MFD. By<br>INTERNATIONAL TRUCK AND ENGINE CORPORATION                                                                                             |                       | DATE          |                     |
| GVWR                                                                                                                                              | GAWR                  | FRONT<br>KG   | FR-REAR-RR<br>KG    |
| A SUITABLE TIRE<br>AND RIM CHOICE                                                                                                                 |                       | TIRES<br>RIMS |                     |
| AT                                                                                                                                                | KPA( PSI) GOLD SINGLE | AT            | KPA( PSI) GOLD DUAL |
| THIS VEHICLE CONFORMS TO ALL APPLICABLE FEDERAL MOTOR VEHICLE SAFETY<br>STANDARDS IN EFFECT ON THE DATE OF MANUFACTURE SHOWN ABOVE.               |                       |               |                     |
| VIN                                                                                                                                               |                       | TYPE          |                     |
| GVWR AND GAWR ARE BASED ON ORIGINAL EQUIP. A CHANGE MAY AFFECT VEHICLE<br>CAPACITIES. SEE OWNER'S MANUAL FOR OTHER TIRE AND CAPACITY INFORMATION. |                       |               |                     |

## Incomplete Vehicle (Chassis-Cab) Certification Label

CHASSIS-CAB MFD. BY  
INTERNATIONAL TRUCK AND  
ENGINE CORPORATION

1. THIS CHASSIS-CAB CON-  
FORMS TO FEDERAL MOTOR  
VEHICLE SAFETY STANDARDS  
NOS. 101, 102, 103, 104, 106  
111, 113, 119, 120, 124,  
205, 206, 207, 208,  
209, 210 AND 302
  
2. THIS VEHICLE WILL CONFORM  
TO STANDARDS NOS. 105/116  
OR 121 AND 108 IF IT IS  
COMPLETED IN ACCORDANCE  
WITH INSTRUCTIONS  
CONTAINED IN THE  
INCOMPLETE VEHICLE  
DOCUMENT FURNISHED PUR-  
SUANT TO 49 CFR PART 568
  
3. CONFORMITY TO THE OTHER  
SAFETY STANDARDS APPLI-  
CABLE TO THIS VEHICLE  
WHEN COMPLETED IS NOT  
SUBSTANTIALLY AFFECTED BY  
THE DESIGN OF THE CHASSIS-  
CAB.

# MACK CHASSIS (25) THOUGHT TO BE IN MEXICO

| MODEL  | GSO   | VIN               | CERTIFICATION | ABS | MODEL YEAR | CUSTOMER                                   | VEHICLE APPLICATION |
|--------|-------|-------------------|---------------|-----|------------|--------------------------------------------|---------------------|
| CX613  | 82167 | 1M1AE06Y31W010071 | EXPORT        | YES | 2001       | Christian Mendoza M.                       | TRACTOR             |
| CX613  | 82269 | 1M1AE06Y41W010130 | EXPORT        | YES | 2001       | Francisco Cárdenas Puente                  | TRACTOR             |
| CX613  | 87415 | 1M1AE06Y22W011617 | EXPORT        | YES | 2002       | Mavi Claderón Ahumada                      | TRACTOR             |
| CX613  | 87415 | 1M1AE06Y42W011618 | EXPORT        | YES | 2002       | Carlos M. Calzada B.                       | TRACTOR             |
| CX613  | 87415 | 1M1AE06Y42W011619 | EXPORT        | YES | 2002       | Basilia Cruz Copca                         | TRACTOR             |
| CX613  | 89785 | 1M1AE06Y72W013024 | U.S.          | YES | 2002       | Basilia Cruz Copca                         | TRACTOR             |
| CX613  | 89785 | 1M1AE06Y02W013026 | U.S.          | YES | 2002       | Transportes Caldez, S.A. de C.V.           | TRACTOR             |
| CH613  | 82241 | 1M1AA18Y71W140093 | EXPORT        | YES | 2001       | Transportes Tercer Milenio                 | TRACTOR             |
| CH613  | 87409 | 1M1AA18Y82W145126 | EXPORT        | NO  | 2002       | Camionera La Silla, S.A. de C.V.           | TRACTOR             |
| CH613  | 87409 | 1M1AA18YX2W145127 | EXPORT        | NO  | 2002       | Fletes y Acarreos de Reynosa, S.A. de C.V. | TRACTOR             |
| CH613  | 87409 | 1M1AA18Y82W145128 | EXPORT        | NO  | 2002       | Camionera La Silla, S.A. de C.V.           | TRACTOR             |
| CH613  | 87409 | 1M1AA18Y32W145129 | EXPORT        | NO  | 2002       | Fletes y Acarreos de Reynosa, S.A. de C.V. | TRACTOR             |
| CH613  | 87409 | 1M1AA18YX2W145130 | EXPORT        | NO  | 2002       | Fletes y Acarreos de Reynosa, S.A. de C.V. | TRACTOR             |
| CV713  | 86115 | 1M2AG12C32M001034 | U.S.          | YES | 2002       | PROYINTEC                                  | CON. MIXER          |
| MR688S | 77172 | 1M2K197C31M019577 | U.S.          | YES | 2001       | SECEYCO                                    | CON. PUMPR          |
| MR688S | 80041 | 1M2K20G31M018067  | U.S.          | YES | 2001       | Silvacroto                                 | CON. PUMPR          |
| MR688S | 80989 | 1M2K197C31M018217 | U.S.          | YES | 2001       | Silvacroto                                 | CON. PUMPR          |
| MR688S | 82655 | 1M2K20G31M018584  | U.S.          | YES | 2001       | Silvacroto                                 | CON. PUMPR          |
| MR688S | 84903 | 1M2K197C31M018804 | U.S.          | YES | 2001       | Silvacroto                                 | CON. PUMPR          |
| MR688S | 85725 | 1M2K197C32M019594 | CANADA        | YES | 2002       | Distribuciones y Procesos ABC              | CON. PUMPR          |
| MR688S | 85946 | 1M2K188G1M019213  | U.S.          | YES | 2001       | Silvacroto                                 | CON. PUMPR          |
| MR688S | 85948 | 1M2K188G1M019220  | U.S.          | YES | 2001       | Silvacroto                                 | CON. PUMPR          |
| MR688S | 85951 | 1M2K197C32M019293 | U.S.          | YES | 2002       | Silvacroto                                 | CON. PUMPR          |
| MR688S | 87020 | 1M2K197C32M019688 | U.S.          | YES | 2002       | Silvacroto                                 | CON. PUMPR          |
| MR688S | 87269 | 1M2K188G1M019687  | U.S.          | YES | 2002       | Silvacroto                                 | CON. PUMPR          |

This listing includes only those chassis of which we are aware; it is possible that a U.S. Mack distributor(s) could have sold chassis of which we are not aware into Mexico.

VIN's beginning with "1M1" are completed vehicles manufactured by Mack; VIN's beginning with "1M2" are chassis-cabs manufactured by Mack.

Shaded VIN's are chassis thought to have been (or to soon be) brought into Mexico by concrete pump body manufacturers.

"GSO" is Mack's "general sales order" identification number, i.e., CX613-82167.

All CH and CX Models listed have sleeper boxes.

Vehicle applications are probable, not definite.